

**PERSONAL INJURY****STATE COURT OF DEKALB COUNTY  
GEORGIA, DEKALB COUNTY**No. 13A49738-7Date Summons Issued and Filed 12/11/13

Deputy Clerk

Deposit Paid \$ 217.50**SECOND ORIG.****SUMMONS**

Agata Iannone Santaguida, as Surviving Parent, and Ambrosio Santaguida, as Administrator  
of the Estate of Teodoro Santaguida, 5204 Lexington Farm Drive, Alpharetta, GA 30004  
(Plaintiff's name and address)

vs.

Dheera Ananthakrishnan, MD, MPH, MS

59 Executive Park South, Atlanta, GA 30329 or at

1224 University Drive NE, Atlanta, GA 30306-2505

(Defendant's name and address)

**ANSWER****JURY****TO THE ABOVE-NAMED DEFENDANT:**

You are hereby summoned and required to file with the Clerk of State Court, Suite 230, 2<sup>nd</sup> Floor, Administrative Tower, DeKalb County Courthouse, 556 N. McDonough Street, Decatur, Georgia 30030 and serve upon the plaintiff's attorney, to wit:

Darren W. Penn, Esquire, Harris Penn Lowry, LLP

(Name)

1201 Peachtree Street NE, 400 Colony Square, Suite 900, Atlanta, GA 30361

(Address)

(404) 961-7650

(Phone Number)

571322

(Georgia Bar No.)

an **ANSWER** to the complaint which is herewith served upon you, within thirty (30) days after service upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. (Plus cost of this action.)

Defendant's Attorney

Third Party Attorney

Address

Address

Phone No.

Georgia Bar No.

Phone No.

Georgia Bar No.

**TYPE OF SUIT**

- ☐ Account  
☐ Contract  
☐ Note  
☐ Trover  
☐ Personal Injury  
☒ Medical Malpractice  
☐ Legal Malpractice  
☐ Product Liability  
☐ Other

Principal \$ \_\_\_\_\_

Interest \$ \_\_\_\_\_

Atty Fees \$ \_\_\_\_\_

☐ Transferred From \_\_\_\_\_

(Attach BLUE to Original and WHITE to Service Copy of complaint)



IN THE STATE COURT OF DEKALB COUNTY

STATE OF GEORGIA

AGATA IANNONE SANTAGUIDA, )  
AS SURVIVING PARENT, AND )  
AMBROSIO SANTAGUIDA, AS )  
ADMINISTRATOR OF THE ESTATE )  
OF TEODORO SANTAGUIDA, )

Plaintiffs, )

v. )

LEAH C. TOBIN, MD, LINDSAY A. )  
LEPAGE, PA-C, NORTH ATLANTA )  
PRIMARY CARE, PC, DHEERA )  
ANANTHAKRISHNAN, MD, MPH, MS, )  
DEBORAH M. WILSON, NP-C, )  
ANGEL D. IGLESIAS, MD, PHD, AND )  
AMARISH KAPASI, MD, )

Defendants. )

Civil Action File No.:

13A49738-7

**JURY TRIAL DEMANDED**

STATE COURT OF  
DEKALB COUNTY, GA.

2013 DEC 11 PM 1:46

FILED

CLERK

**COMPLAINT FOR DAMAGES**

Agata Iannone Santaguida, as Surviving Parent, and Ambrosio Santaguida, Administrator of the Estate of Teodoro Santaguida, hereby file this Complaint for Damages and Demand for Jury Trial against the Defendants, Leah C. Tobin, MD, Lindsay LePage, PA-C, North Atlanta Primary Care, PC, Dheera Ananthakrishnan, MD, MPH, MS, Deborah M. Wilson, NP-C, Angel Iglesias, MD, PhD, and Amarish Kapasi, MD, and show the following:

**PARTIES**

1.

Teodoro Santaguida was unmarried with no children at the time of his death. Agata Iannone Santaguida, surviving parent of Teodoro Santaguida, is statutorily entitled to any recovery for this wrongful death action. Ambrosio Santaguida is the Administrator of the Estate of Teodoro Santaguida. As the representative of the Estate of Teodoro Santaguida, Ambrosio Santaguida is a proper party to bring the estate based claims related to the death of Teodoro Santaguida. Plaintiffs submit to the jurisdiction and venue of this Court.

2.

Defendant Leah C. Tobin, M.D. ("Defendant Tobin"), is a physician specializing in family medicine, duly licensed under the laws of the State of Georgia. Defendant Tobin may be served with process by serving her at 3400 Old Milton Parkway, Suite 270, Alpharetta, Fulton County, Georgia 30005.

3.

At all times pertinent hereto, Defendant Tobin was engaged in the practice of medicine in Georgia, and, during the practice of her profession, she was required to utilize the professional skills, knowledge, and experience which she possessed and/or was required to possess, to pursue her profession in accordance with reasonably safe and acceptable standards of medicine.

4.

Defendant Lindsay A. LePage, PA-C ("Defendant LePage"), is a physician assistant, duly licensed under the laws of the State of Georgia, who was working under the supervision of Defendant Tobin at the relevant time as alleged herein. Defendant LePage may be served with process by serving her at 78 Douglas Street, SE, Atlanta, DeKalb County, Georgia 30317.

5.

At all times pertinent hereto, Defendant LePage was engaged in the practice of medicine as a physician's assistant in Georgia, and, during the practice of her profession, she was required to utilize the professional skills, knowledge, and experience which she possessed and/or was required to possess, to pursue her profession in accordance with reasonably safe and acceptable standards of medicine.

6.

Defendant North Atlanta Primary Care, P.C. ("Defendant NAPC"), is a Georgia corporation and may be served with process by serving its registered agent, Roderick Rusyniak, at 3400C Old Milton Parkway, Suite 270, Alpharetta, Fulton County, Georgia, 30005. Defendant NAPC is subject to the jurisdiction of this Court.

7.

At all times pertinent hereto, Defendant NAPC held itself out in the community as being a fully capable and competent medical practice, serving the needs of patients in the Atlanta area.

8.

At all times pertinent hereto, Defendants Tobin and LePage were actual and/or ostensible agents, servants and/or employees of Defendant NAPC, and acted in such a capacity. As such, Defendant NAPC is liable for Defendants Tobin and LePage's negligent acts, as well as the

negligent acts of other healthcare providers that treated Mr. Santaguida, as an actual and/or ostensible agent, servant and/or employee.

9.

Defendant Dheera Ananthakrishnan, MD, MPH, MS ("Defendant Ananthakrishnan"), is a physician specializing in orthopedic surgery, duly licensed under the laws of the State of Georgia. Defendant Ananthakrishnan may be served with process by serving her at 59 Executive Park South, Atlanta, DeKalb County, Georgia 30329.

10.

At all times pertinent hereto, Defendant Ananthakrishnan was engaged in the practice of medicine in Georgia, and, during the practice of her profession, she was required to utilize the professional skills, knowledge, and experience which she possessed and/or was required to possess, to pursue her profession in accordance with reasonably safe and acceptable standards of medicine.

11.

Defendant Deborah M. Wilson, NP-C ("Defendant Wilson"), is a nurse practitioner, duly licensed under the laws of the State of Georgia, who was working under the supervision of Defendant Ananthakrishnan at the relevant time as alleged herein. Defendant Wilson may be served with process by serving her at 59 Executive Park South, Atlanta, DeKalb County, Georgia 30329.

12.

At all times pertinent hereto, Defendant Wilson was engaged in the practice of medicine as a nurse practitioner in Georgia, and, during the practice of her profession, she was required to utilize the professional skills, knowledge, and experience which she possessed and/or was

required to possess, to pursue her profession in accordance with reasonably safe and acceptable standards of medicine.

13.

Defendant Angel Iglesias, MD, PhD ("Defendant Iglesias"), is a physician specializing in internal medicine, duly licensed under the laws of the State of Georgia. Defendant Iglesias may be served with process by serving him at 1670 Clairmont Road, DeKalb County, Georgia 30033.

14.

At all times pertinent hereto, Defendant Iglesias was engaged in the practice of medicine in Georgia, and, during the practice of his profession, he was required to utilize the professional skills, knowledge, and experience which he possessed and/or was required to possess, to pursue his profession in accordance with reasonably safe and acceptable standards of medicine.

15.

Defendant Amarish Kapasi, MD, ("Defendant Kapasi"), is a physician specializing in physical medicine and rehabilitation, duly licensed under the laws of the State of Georgia. Defendant Kapasi may be served with process by serving him at 1670 Clairmont Road, DeKalb County, Georgia 30033.

16.

At all times pertinent hereto, Defendant Kapasi was engaged in the practice of medicine in Georgia, and, during the practice of his profession, he was required to utilize the professional skills, knowledge, and experience which he possessed and/or was required to possess, to pursue his profession in accordance with reasonably safe and acceptable standards of medicine.

17.

At all times pertinent hereto, the Defendants enjoyed a medical treatment provider/patient relationship with Mr. Santaguida. The Defendants rendered and/or undertook to render medical treatment or care to MR. Santaguida, acting individually or as or through actual and/or ostensible agents, servants and employees.

**JURISDICTION AND VENUE**

18.

Venue is proper in this Court pursuant to O.C.G.A. §§ 9-10-31, 14-2-510, and Art. VI, § 2, ¶¶ 4 and 6 of the Georgia Constitution.

19.

This Court has subject matter jurisdiction over this action.

20.

Each of the Defendants is subject to the personal jurisdiction of this Court.

**OPERATIVE FACTS**

21.

Mr. Santaguida was a retired Storekeeper Second Class for the United States Navy.

22.

In May 2010, Mr. Santaguida fell approximately 9 feet through the attic in his home. He initially experienced medial right knee pain which necessitated a pain control regimen. He was treated at the Atlanta Veterans Affairs Medical Center ("Atlanta VAMC").



23.

On August 9, 2010, Mr. Santaguida was treated at the Atlanta VAMC at an orthopedic consult where an MRI imaging study was positive for right knee medial collateral ligament strain/sprain.

24.

On February 14, 2011, Mr. Santaguida was seen at the Atlanta VAMC, by Defendant Iglesias for a follow-up of the ligament sprain in knee. At that time, Dr. Iglesias noted myofascial lower back pain.

25.

On March 14, 2011, Mr. Santaguida was seen at the Atlanta VAMC Emergency Room with complaints of lower back pain. He was given hydromorphone and hydralazine, which he did not tolerate.

26.

On March 16, 2011, he had a follow-up appointment with Defendant Iglesias with complaints of lower back pain. Despite being provided multiple narcotics at the emergency room days before, Mr. Santaguida was still suffering tremendous back pain. Despite this, at the March 16, 2011, follow-up, he was prescribed the following medications for pain: diazepam 10 mg (one tablet twice a day) and methocarbamol 750 mg (one tablet four times a day for muscle spasms), in addition to zolpidem tartrate 10 mg (one tablet at bedtime), tramadol hcl 50 mg (one tablet three times a day), methylprednisolone 4 mg (dosepak), ibuprofen 800 mg (one tablet three times a day), and hydrocodone 5/acetaminophen 500 mg (one to two tablets every eight hours, as needed for pain). It was noted at that time that Mr. Santaguida had an intolerance to narcotics and tramadol.



27.

On March 24, 2011, Defendant Kapasi saw Mr. Santaguida for a physical medicine rehabilitation consult for radiating lower back pain and right lateral thigh numbness due to radiculopathy and moderately severe muscle spasm. Defendant Kapasi discontinued the hydrocodone 5/acetaminophen 500 mg and started Mr. Santaguida on oxycodone 5 mg—a more powerful pain medication.

28.

Mr. Santaguida's lower back pain persisted, and, on May 19, 2011, Mr. Santaguida received a lumbar epidural steroid injection to relieve the pain. The procedure was not successful in providing long term relief. Again, on June 21, 2011, Defendant Kapasi performed another caudal epidural steroid injection, which did not provide any long term relief for the lower back pain.

29.

On August 25, 2011, Mr. Santaguida had a follow-up appointment with Dr. Kapasi. He informed the doctor that his lower back pain was constant, radiating and was reported to be at a 10 out of 10. None of the treatment he had been receiving over the past year had provided any relief to his lower back pain. Mr. Santaguida requested a surgical consult at that time. He reported to taking two oxycodone 5 mg capsules and diazepam, another pain medication, at night, as well as tramadol during the day. Defendant Kapasi increased the oxycodone to 15 mg every 12 hours for pain.

30.

On September 12, 2011, Defendant Iglesias saw Mr. Santaguida for continued lower back pain. At that time, Defendant Iglesias prescribed another pain medication, gabapentin 300 mg

(one capsule three times a day). The lower back pain was noted as uncontrolled at that time. In a follow-up note, Defendant Iglesias notes the addition of morphine sulphate, yet another pain medicine, to Mr. Santaguida's pain management regime.

31.

On October 4, 2011, Mr. Santaguida presented at the Atlanta VAMC Emergency Room with complaints of intense stomach aching and severe back pain. At that time, he was taking diazepam 10 mg, gabapentin 300 mg, morphine sulfate 30 mg, and oxycodone hcl 30 mg, all pain medications.

32.

On October 6, 2011, Mr. Santaguida was seen for an orthopedic consult by Defendant Wilson and Defendant Ananthakrishnan. On October 7, 2011, surgery on Mr. Santaguida's spine was scheduled, but cancelled, as no surgical indication was present at that time. His discharge pain medications were diazepam 10 mg (one tab two times a day), gabapentin 300 mg (one cap three times a day), hydrocodone 10mg/acetaminophen 500mg (1-2 tabs every 4-6 hours as needed), morphine sulfate SR 30 mg (one tab two times day), and oxycodone hcl 15 mg (one tab two times day).

33.

On October 18, 2011, Mr. Santaguida presented at the Atlanta VAMC for an unscheduled visit as a result of continued sharp stomach pain and lower back pain. His pain had not improved from his overnight hospitalization on October 6-7, 2011, noting poor appetite, nausea and dizziness. The dizziness was reported severe enough to feel like he was going to black out. The pain was noted to be exacerbated when eating or taking medication. Depression was noted.

34.

On October 20, 2011, Defendant Iglesias increased the morphine sulfate from 30 mg to 45 mg.

35.

On November 8, 2011, Mr. Santaguida was seen by Defendant Tobin and Defendant LePage at Defendant NAPC with complaints of abdominal pain and depression. Defendant Tobin and Defendant LePage prescribed Mr. Santaguida fluoxetine 20 mg (one capsule daily) for his depression.

36.

December 5, 2011, Mr. Santaguida's depression screen was positive at the Atlanta VAMC. A mental health consult was recommended. At that visit, Mr. Santaguida was provided prescriptions by Defendant Iglesias for oxycodone hcl 5 mg (three tablets by mouth twice a day for pain) and an increased prescription of morphine sulfate 60 mg, (one tablet by mouth twice a day for pain), in addition to his existing prescriptions of tramadol hcl 50 mg (one tablet three times a day) and diazepam 10 mg (one tablet twice a day).

37.

On December 10, 2011, Mr. Santaguida received a refill of fluoxetine 20 mg by Defendant Tobin and Defendant LePage.

38.

On December 11, 2011, Mr. Santaguida was found dead in his bed at his home.

39.

As a result of the treatment Mr. Santaguida received by Defendants, Mr. Santaguida experienced extreme pain and suffering from May 2010 until his death on December 11, 2011.

40.

Mr. Santaguida's injuries and resulting damages were caused or contributed to by the combined negligence of the Defendants, as set forth below, in violation of the applicable standards of care.

41.

Mr. Santaguida's death was proximately caused by the Defendants' negligence in that the Defendants did not exercise the degree of care and skill generally employed by their profession under similar circumstances as required by O.C.G.A. § 51-1-27.

42.

Pursuant to O.C.G.A. § 9-11-9.1, this case has been reviewed by a qualified medical expert, who supports medical negligence claims as to each of the Defendants in this action. A copy of the Affidavit of Susan Blank, M.D., along with her curriculum vitae, is attached hereto as Exhibit A. A copy of Mr. Santaguida's medical records, which were reviewed and are part of Dr. Blank's Affidavit, are attached as Exhibit B and are filed under seal with this Complaint.

43.

The Affidavit of Dr. Blank sets forth at least one act of negligence and deviation from the standard of care against Defendants, which caused harm to Mr. Santaguida.

44.

To the extent that O.C.G.A. § 9-11-9.2 requires the attachment of a medical authorization to the Complaint, Plaintiffs rely upon the decision in *Allen v. Wright*, 282 Ga. 9 (2007), which holds that O.C.G.A. § 9-11-9.2 is expressly preempted by the Health Information Portability and Accountability Act of 1996. In accordance with the Georgia Supreme Court's holding, Plaintiffs contend that O.C.G.A. § 9-11-9.2 is null and void as being contrary to and in abrogation of federal law. Accordingly, a medical authorization is not attached to Plaintiffs' Complaint.

45.

As a direct and proximate result of the negligent acts and omissions of the above referenced Defendants, Ambrosio Santaguida, as the Administrator of the Estate of Mr. Santaguida is entitled to recover funeral and burial expenses for Mr. Santaguida from the Defendants jointly and severally, in such amount as shall be shown by the evidence and proven at trial.

46.

As a direct and proximate result of the negligent acts and omissions of the above referenced Defendants, Mr. Santaguida suffered and sustained conscience physical and mental pain and suffering prior to his death and accordingly Plaintiffs are entitled to recover damages from the Defendants, jointly and severally, in such an amount as may be determined by the jury in its enlightened conscience from all the evidence for the physical and mental pain and suffering sustained by Mr. Santaguida prior to his death.

47.

By reason of the foregoing, Agata Iannone Santaguida, as Surviving Parent of the late Teodoro Santaguida, is entitled to recover damages from the Defendants jointly and severally for the full value of the life of Mr. Santaguida as determined by the trier of fact.

**COUNT ONE: NEGLIGENCE**

48.

Plaintiffs hereby reincorporate paragraphs 1-48 of this Complaint as if fully restated herein.

49.

Defendants Tobin, LePage, Ananthakrishnan, Wilson, Iglesias, and Kapasi ("Defendant Medical Practitioners") undertook to provide medical care and treatment to Mr. Santaguida, in relation to his back pain and/or depression.

50.

Defendant Medical Practitioners owed Mr. Santaguida a duty to exercise the degree of skill and care ordinarily employed by physicians in the care of treatment of patients under like circumstances.

51.

Defendant Medical Practitioners violated accepted medical practices and the standard of care pertaining to Mr. Santaguida in one or more of the following ways:

- a. In failing to document the complete prescription medication history by each and every medical provider treating Mr. Santaguida prior to his death;
- b. In prescribing multiple dosages of medications that in combination are known to cause significant central nervous system depression;
- c. In prescribing a combination of the long-acting benzodiazepine, diazepam which interacted with morphine, and oxycodone and created an additive lethal suppression of the central nervous system; and
- d. In prescribing fluoxetine in combination with the morphine and oxycodone, as fluoxetine and morphine share a metabolic pathway through the liver.

52.

Defendant Medical Practitioners' treatment of Mr. Santaguida fell well below the degree of skill and care that is ordinarily employed by the medical profession generally and obstetricians in particular, under similar conditions and like circumstances.

53.

Defendant Medical Practitioners' negligence was a proximate cause of the injuries and death suffered by Mr. Santaguida, as set forth herein. Thus, Defendants are liable to the Plaintiffs for the damages, as set forth herein, that Mr. Santaguida suffered as a result of Defendants' negligence.

**COUNT TWO: RESPONDEAT SUPERIOR LIABILITY**

54.

Plaintiffs hereby incorporate paragraphs 1-53 of this Complaint as if fully restated herein.

55.

Upon information and belief, Defendants Tobin and LePage were at all times relevant to this action an employee or agent of Defendant NAPC and were acting in their capacity as an employee and/or agent of Defendant NAPC when they provided medical care and treatment to Mr. Santaguida.

56.

As such, Defendant NAPC is liable for the damages and injuries and death Mr. Santaguida suffered, as set forth above, under a theory of respondeat superior, for the negligent acts of their agent, Defendants Tobin and LePage.

**WHEREFORE**, Plaintiffs demand a **JURY TRIAL** and pray for judgment as follows:

- a. That process issue and the Defendants be served with a copy of the Summons and Complaint;



- b. That Plaintiffs be awarded damages from the Defendants in an amount in excess of \$10,000.00, to be proven at trial and determined in the enlightened conscience of the jury;
- c. That Defendants be charged with all court costs attributable to this action and such other costs reasonably incurred in the prosecution and trial of this case;
- d. That Plaintiffs recover all wrongful death damages for the death of Teodoro Santaguida;
- e. That Plaintiffs recover all estate damages for the death of Teodoro Santaguida; and
- f. For such other and further relief as the Court deems just and proper.

Respectfully submitted this 11<sup>th</sup> day of December, 2013.

HARRIS PENN LOWRY LLP



DARREN W. PENN

Georgia Bar No. 571322

JEFFREY R. HARRIS

Georgia Bar No. 330315

STEPHEN J. LOWRY

Georgia Bar No. 460289

JED D. MANTON

Georgia Bar No. 868587

KELLEY B. SIMONEAUX

Georgia Bar No. 504602

400 Colony Square  
1201 Peachtree St. NE, Suite 900  
Atlanta, GA 30361  
Telephone: (404) 961-7650  
Facsimile: (404) 961-7651

*Attorneys for Plaintiffs*

IN THE STATE COURT OF DEKALB COUNTY

STATE OF GEORGIA

AGATA IANNONE SANTAGUIDA,  
AS SURVIVING PARENT, AND  
AMBROSIO SANTAGUIDA, AS  
ADMINISTRATOR OF THE ESTATE  
OF TEODORO SANTAGUIDA,

Plaintiffs,

v.

LEAH C. TOBIN, MD, LINDSAY A.  
LEPAGE, PA-C, NORTH ATLANTA  
PRIMARY CARE, PC, DHEERA  
ANANTHAKRISHNAN, MD, MPH, MS,  
DEBORAH M. WILSON, NP-C,  
ANGEL D. IGLESIAS, MD, PHD, AND  
AMARISH KAPASI, MD,

Defendants.

Civil Action File No.:

JURY TRIAL DEMANDED

O.C.G.A. § 9-11-9.1 AFFIDAVIT OF SUSAN BLANK, M.D.

This 11<sup>th</sup> day of December, 2013.

HARRIS PENN LOWRY LLP

BARREN W. PENN

Georgia Bar No. 571322

JEFFREY R. HARRIS

Georgia Bar No. 330315

STEPHEN J. LOWRY

Georgia Bar No. 460289

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KELLEY B. SIMONEAUX

Georgia Bar No. 504602

400 Colony Square  
1201 Peachtree Street, NE  
Suite 900  
Atlanta, GA 30361  
(404) 961-7650 (T)  
(404) 961-7651 (F)

*Counsel for Plaintiffs*

Exhibit A

STATE COURT OF  
DEKALB COUNTY, GA.

2013 DEC 11 PM 1:46

FILED

BY: DEPUTY CLERK

**AFFIDAVIT OF SUSAN BLANK, M.D.**

STATE OF GEORGIA :

:

COUNTY OF GWINNETT :

Personally appearing before the undersigned officer duly authorized to administer oath in this State, Susan Blank, M.D., who after first being duly sworn, states as follows:

1. I am a medical doctor, trained and Board certified in the specialty of psychiatry and neurology, forensic examination, and addiction medicine. A true and accurate photocopy of my Curriculum Vitae, in which my professional background, training, and experience are accurately summarized, is appended hereto and made a part hereof. I am currently licensed to practice in the State of Georgia. I have been practicing in psychiatry since 1990 and addiction medicine continuously since 2002. I have been continuously board certified in psychiatry and neurology since 1992 and addiction medicine since 2004. I am over the age of eighteen years, and I suffer from no disability which would render me incompetent to make this affidavit.
2. Based on my education, training, and experience, I am familiar with the degree of care and skill ordinarily exercised by members of the medical profession generally ("the standard of care") in pain management and psychiatry. Specifically, I am familiar with the standard of care applicable to physicians and nurses who provide care to patients such as Teodoro Santaguida ("Mr. Santaguida"), as his circumstances and conditions are reflected and more fully described in the medical records identified herein.
3. I have reviewed the certified copy of medical records from the Atlanta Veterans Affairs Medical Center, North Atlanta Primary Care, PC, Northside Hospital Forsyth, Digestive Care Physicians, LLC, the Medical Examiners Report, and death certificate, pertaining to: Mr. Santaguida's medical treatment and care related to his back pain and depression through his death on December 11, 2011. It is my understanding that a true and correct copy of the certified records that I have reviewed will be filed with the Court in conjunction with the filing of this Affidavit.
4. On the basis of my review of these medical records and upon my education, training, and experience, it is my opinion that Drs. Leah Tobin, Dheera Ananthakrishnan, Angel Iglesias, and Amarish Kapasi, as well as Lindsay LePage, PA-C and Deborah Wilson, NP (the "Medical Practitioners") failed to exercise the degree of care and skill ordinarily exercised by the members of the medical profession generally under the same or similar circumstances. Further, it is my opinion that the Medical Practitioners'

departures from the standard of care, described in more detail herein, to a reasonable degree of medical certainty, caused or contributed to the injuries suffered by Mr. Santaguida.

5. The medical issues in this matter revolve around the prescription of multiple medications for lower back pain as well as the prescription fluoxetine for depression. I have actual professional knowledge and experience with the care of patients taking medication for back pain as well as depression. I have practiced and performed functions, including the supervision and instruction of nurse professionals, directly involved in these areas during each of the five years leading up to Mr. Santaguida's death on December 11, 2011,
6. By and through my actual professional knowledge and experience, I am familiar with the standard of care that the Medical Practitioners were required to exercise as it pertains to these issues, which includes documenting all medications prescribed by all medical providers, the known risks and interactions among various prescription medications, including the toxic and lethal effects of medications prescribed to Mr. Santaguida immediately prior to his death.
7. Mr. Santaguida is a retired Storekeeper Second Class for the United States Navy. In May 2010, Mr. Santaguida fell approximately 9 feet through the attic in his home. He initially experienced medial right knee pain which necessitated a pain control regimen. He was treated at the Atlanta Veterans Affairs Medical Center ("Atlanta VAMC"). On August 9, 2010, Mr. Santaguida was treated at the Atlanta VAMC at an orthopedic consult where an MRI imaging study was positive for right knee medial collateral ligament strain/sprain.
8. On February 14, 2011, Mr. Santaguida was seen at the Atlanta VAMC, by Dr. Angel Iglesias for a follow-up of the ligament sprain in knee, noting myofascial lower back pain. On March 14, 2011, Mr. Santaguida was seen at the Atlanta VAMC Emergency Room with complaints of lower back pain. On March 16, 2011, he had a follow-up appointment with Dr. Iglesias with complaints of lower back pain. At that time, he was prescribed diazepam 10 mg (one tablet twice a day) and methocarbamol 750 mg (one tablet four times a day for muscle spasms), in addition to zolpidem tartrate 10 mg (one tablet at bedtime), tramadol hcl 50 mg (one tablet three times a day), methylprednisolone 4 mg (dosepak), ibuprofen 800 mg (one tablet three times a day), and hydrocodone 5/acetaminophen 500 mg (one to two tablets every eight hours, as needed for pain). On March 24, 2011, Dr. Amarish Kapasi saw Mr. Santaguida for a physical medicine rehabilitation consult for radiating lower back pain and right lateral thigh numbness due to radiculopathy and moderately severe muscle spasm. Dr.

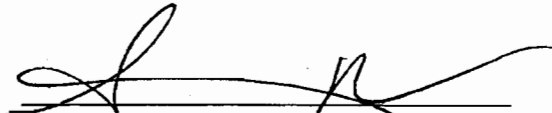
Kapasi discontinued the hydrocodone 5/acetaminophen 500 mg and started Mr. Santaguida on oxycodone 5 mg.

9. Mr. Santaguida's lower back pain persisted, and, on May 19, 2011, Mr. Santaguida received a lumbar epidural steroid injection, which did not provide long term relief. Again, on June 21, 2011, Dr. Kapasi performed a caudal epidural steroid injection, which did not provide any long term relief for the lower back pain.
10. Mr. Santaguida continued to be under the care of Atlanta VAMC and on July 16, 2011, was on a pain management regimen of diazepam 10 mg, ibuprofen 800 mg, methocarbamol 500 mg, oxycodone hcl 5 mg, and tramadol hcl 50 mg.
11. On August 25, 2011, Mr. Santaguida had a follow-up appointment with Dr. Kapasi. He informed the doctor that his lower back pain was constant, radiating and was reported to be at a 10 out of 10. Mr. Santaguida requested a surgical consult at that time. He reported to taking two oxycodone 5 mg capsules and diazepam at night, as well as tramadol during the day. Dr. Kapasi increased the oxycodone to 15 mg every 12 hours for pain.
12. On September 12, 2011, Dr. Iglesias saw Mr. Santaguida for continued lower back pain. At that time, Dr. Iglesias prescribed gabapentin 300 mg (one capsule three times a day). The lower back pain was noted as uncontrolled at that time. In a follow-up note, Dr. Iglesias notes the addition of morphine sulphate to Mr. Santaguida's pain management regime.
13. On October 4, 2011, Mr. Santaguida presented at the Atlanta VAMC Emergency Room with complaints of intense stomach aching and severe back pain. At that time, he was taking diazepam 10 mg, gabapentin 300 mg, morphine sulfate 30 mg, and oxycodone hcl 30 mg.
14. On October 6, 2011, Mr. Santaguida was seen for an orthopedic consult by Deborah Wilson, NP-C and Dr. Dheera Ananthakrishnan, when Mr. Santaguida was admitted to Atlanta VAMC as an inpatient. On October 7, 2011, surgery on Mr. Santaguida's spine was scheduled, but cancelled, as no surgical indication was present at that time. His discharge medications were diazepam 10 mg (one tab two times a day), gabapentin 300 mg (one cap three times a day), hydrocodone 10mg/acetaminophen 500mg (1-2 tabs every 4-6 hours as needed), morphine sulfate SR 30 mg (one tab two times day), and oxycodone hcl 15 mg (one tab two times day).

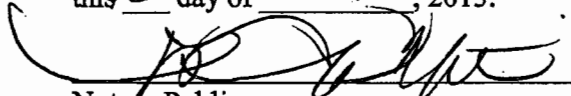
15. On October 18, 2011, Mr. Santaguida presented at the Atlanta VAMC for an unscheduled visit as a result of continued sharp stomach pain and lower back pain. Depression was noted. On October 20, 2011, Dr. Iglesias increased the morphine sulfate from 30 mg to 45 mg.
16. On November 8, 2011, Mr. Santaguida was seen by Dr. Leah Tobin at North Atlanta Primary Care with complaints of abdominal pain and depression. Dr. Tobin prescribed Mr. Santaguida fluoxetine 20 mg (one capsule daily).
17. December 5, 2011, Mr. Santaguida's depression screen was positive at the Atlanta VAMC. A mental health consult was recommended. Mr. Santaguida was provided prescriptions for oxycodone hcl 5 mg (three tablets by mouth twice a day for pain) and an increased prescription of morphine sulfate 60 mg, (one tablet by mouth twice a day for pain), in addition to his existing prescriptions of tramadol hcl 50 mg (one tablet three times a day) and diazepam 10 mg (one tablet twice a day).
18. On December 10, 2011, Mr. Santaguida received a refill of fluoxetine 20 mg.
19. On December 11, 2011, Mr. Santaguida was found dead in his bed at his home.
20. The negligence and departures from the standard of care of the Medical Practitioners included the following:
  - a. In failing to document the complete prescription medication history by each and every medical provider treating Mr. Santaguida prior to his death;
  - b. In prescribing multiple dosages of medications that in combination are known to cause significant central nervous system depression;
  - c. In prescribing a combination of the long-acting benzodiazepine, diazepam which interacted with morphine, and oxycodone and created an additive lethal suppression of the central nervous system..
  - d. In prescribing fluoxetine in combination with the morphine and oxycodone, as fluoxetine and morphine share a metabolic pathway through the liver.
21. The autopsy findings of the Medical Examiner are that Mr. Santaguida died as a result of the combined effects of opiates and benzodiazepines causing respiratory depression, lung congestion and respiratory arrest. My opinion is that the conclusions of the Medical Examiner are consistent with my findings that there existed a lack of adequate documentation which led to over-prescribing of medications which have a depressive effect on the central nervous system.

21. It is not the purpose of this Affidavit to set forth each and every criticism I have or may have in the future based upon further review and consideration of information concerning the care and treatment of Teodoro Santaguida. I have expressed my opinions to a reasonable degree of medical certainty. I understand that this affidavit will or may be used in connection with the prosecution of a lawsuit, or for any other purpose allowed by Georgia law.

**Further Affiant Sayeth Not.**

  
Susan Blank, M.D.

Sworn to and subscribed before me  
this 10 day of DECEMBER, 2013.

  
Notary Public





## **Susan Kaye Blank, MD**

3646 Killamey Trail  
Snellville, Georgia  
30039  
770-686-9036 (cell)  
770-736-9920 (home)  
[susanblankmd@hotmail.com](mailto:susanblankmd@hotmail.com)

### **Education**

#### **Fellowship and Advanced Fellowship Training American Academy of Anti-aging and Regenerative Medicine**

*Boca Raton, Florida*

**2011-2013**

Training in Functional Medicine is an integrative, science-based healthcare approach that treats illness and promotes wellness by focusing on the bio-chemically unique aspects of each patient, and then individually tailoring interventions to restore physiological, psychological, and structural balance

Currently enrolled in a Certificate Program in Metabolic and Nutritional Medicine with Certification in Brain Fitness from the University of South Florida, School of Medicine in association with the FAARM program.

#### **University of Virginia**

**Institute for Law, Psychiatry and Public Policy**

*Charlottesville, Virginia*

**1990-1991**

Training program in Basic and Advanced Forensic Evaluations. Focus on competency issues, evaluation of sex offenders, pre and post sentencing evaluations, capital sentencing evaluations and insanity defense.

**Certification as Forensic Examiner for the State of Virginia**

#### **Sheppard and Enoch Pratt Hospital**

*Baltimore, Maryland*

**July 1985- Dec 1989**

- 4 year Psychiatric Residency training program with rotating medical internship. Also, an additional 6 months rotation at Montebello Rehab Hospital with the Head Injury Trauma team from the University of Maryland Shock Trauma Center
- Chief Resident 1987-1989
- Resident delegate to the legislative committee of MedChi (Medical Society of Maryland)
- Clarence Schulz Prize for 1988.

**Medical College of Georgia**  
*Augusta, Georgia*

**Sept 1981- June 1985**

- MD degree
- Award for "Best Psychiatry Student"
- Award "Top 5 Surgical Students"
- Student Council Representative

**Augusta College**  
*Augusta, Georgia*

**Sept 1976- Aug 1981**

- B.A. in Psychology with minors in biology, chemistry, and physics
- BETA BETA BETA Honor Society, Phi Beta Kappa Honor Society,
- Student Council Representative

**Brigham Young University**  
*Provo, Utah*

**Sept 1972- May 1973**

- Major in Mechanical Engineering
- AeroJet Nuclear scholarship
- Rhythmic Gymnastics Team Member

**Accreditation and Certifications**

Board Certified 1992: American Board of Psychiatry and Neurology

1994: National Board of Forensic Examiners

2004: American Society of Addiction Medicine

2009: American Board of Addiction Medicine

Certified Forensic Examiner for the State of Virginia, 1990-1991.

Certified Tobacco Healing Specialist 2012: Tobacco Healing Centre, Ottawa, Ontario Canada

Fellow American College of Forensic Examiners, 1995

Fellow of the American Psychiatric Association 2012

Medical Review Officer Certification 2002:

**Medical Review Officer Recertification 2009**

Medical Review Officer Certification Council, Certified by Department of Transportation Programs 49 CFR, part 40

**Current Medical License:**

Georgia

**Past Medical Licenses:**

Maryland, Virginia, Pennsylvania

**Clinical Appointments**

Clinical Associate Professor of Psychiatry, Penn State College of Medicine,  
January 2008-March 2009

**Professional Experience**

**June 2012 –Present Atlanta Healing Center**  
*Lawrenceville, Georgia*

Chief Medical Officer and Director of Medical and Clinical Services for an Outpatient Treatment Program dedicated to treating patients with addiction and other co-occurring disorders. Responsible for over-seeing psychiatric services, addiction services, assessments for patients with chronic pain, bariatric patients, and impaired professionals; Quantitative EEG (brain mapping), neurofeedback, nutritional and hormonal assessments, tobacco addiction treatment, holistic treatments, individual, couples and group therapy.

Responsible for creating all policies and procedures for both the clinical and administrative departments, budgets, hiring and training of staff. Developing the programming, and supervision of staff.

Research: Pain and QEEG, Addiction and QEEG with University of Georgia School of Pharmacy

**April 2011- April 2012 GreeneStone Muskoka and Nova Natural Resources Corporation**  
*Bala, Ontario, Canada and Wilton Manners, Florida*

One year consulting contract to serve as Executive Vice President of Addiction Services. Responsible for developing programming and implementation for startup addiction and co-occurring holistic treatment center for executives and impaired professionals. GreeneStone Muskoka opened in Summer of 2011 with 36 adult beds, including 6 medically supervised detoxification beds, initially, with expansion planned for increased number of beds in Bala, along with outpatient and aftercare services in Toronto.

Responsible for creating all policies and procedures for both administrative as well as clinical services, development of budgets for all departments, hiring and training of all staff, creation and oversight of electronic medical record, clinical supervision, and ongoing management of the treatment center.

Developing research projects to assess outcomes, improve treatment programming and continue the project on hormone studies commenced in Georgia.

**March 2011-Present Susan K. Blank, MD, LLC**  
*Snellville, Georgia*

**March 2009-March 2011 Foundations Recovery Network**

*Atlanta, Georgia*

Director of Medical and Clinical Services for outpatient programming for patients with dual diagnoses. Specialty programs for patients with pain and addiction, young adults, pre-trial interventions, and care management. Ambulatory Detox and medication management. Also monitoring and advocacy for impaired professionals.

Oversight and supervision of all medical and clinical staff. Responsible for development of policies and procedures, as well as program development, compliance with state regulations, marketing, and research.

Research Projects: *Testosterone levels in men with addiction*, associated with University of Georgia School of Pharmacy. *Application and outcomes associated with the use of the Personal Health Improvement Program (PHIP) in the addicted pain and the chronic pain patients*. Associated with MERTECH and Harvard Medical School. *Stress, Depression and addiction in female attorneys and female physicians*. Ongoing 3 year study associated with CARON Treatment center and University of Pennsylvania.

**March 2007-March 2009 Caron Treatment Centers**

*Wernersville, Pennsylvania*

Executive Vice President of Treatment Services, Chief Medical Officer. Responsible for addiction and co-occurring treatment at Caron for adolescent and adult services thru the continuum of care. Over sees 400 clinical staff, as well as the Department of Medicine, Department of Nursing, Department of Psychology, Department of Pastoral Care, Focused Continuing Care, Research Department, Caron Center for Self Development and Caron Counseling Center. Managed Budget of \$75 million per year.

Caron has 10 detox beds, 83 primary adult treatment beds, 90 extended care beds, 21 Young Adult Male primary beds, 12 Young Adult Female primary beds, 40 adolescent primary beds, and 45 adolescent extended care beds, 16 Beds at Center for Self Development, and 90 Bed PHP/IOP at Caron Counseling. Special interests in treatment of chronic pain in patients with addiction, as well as the treatment of methamphetamine addiction, and co-dependency. We have a fully staffed research department and are working on several projects with University of Penn. Have NIDA grant for study of pain and addiction. We also are an APA approved training site for psychology interns and train psychiatry residents and child psychiatry fellows from Penn State Hershey Medical Center. We also train family practice residents from Reading Hospital, Lancaster General Hospital and Lehigh Valley Hospital.

Research Projects: Menstrual Cycle disturbances in women with addiction. Spirituality levels and drug cravings. Outcome studies 1 year follow up. Stress, Depression and Addiction in female attorneys and physicians. All associated with TRI and UPENN

**February 2006-March 2007 Southeastern Pain Specialists, P.C., Southern Recovery Centers, P.C.**

*Atlanta, Georgia and Greensboro, Georgia*

Addiction Medicine and Interventional Pain Management at Southeastern Pain Specialists, Southern Recovery Centers, and Ambulatory Surgery Centers. Outpatient treatments for patients with chronic pain. Specializing in medication management, interventional procedures, and tapering of medications. Also providing Suboxone treatments for opiate dependence in patients with addiction and chronic pain.

**March 2003-January 2006 Talbott Recovery Campus**

*Atlanta, Georgia*

Psychiatry and Addiction Medicine at Talbott Recovery Campus and Anchor Hospital. Attending physician for Partial Hospital program and detox in-patient at Anchor Hospital. TRC specializes in the treatment of impaired

professionals. 2004 Vice President of Anchor Hospital Medical Staff. Member of the Clinical Advisory Committee, Outcome Studies Committee and Speakers Bureau. Special interest in women's issues in addiction with ongoing research programs in areas of women and addiction, anxiety disorders in the addicted patient, and history of trauma in the addicted patient.

Research: 3 year outcome study on professionals. Evaluation of predictors of recovery for professional and lay public. Comparison of Female and Male patients and their recovery issues.

**April 1991- Feb 2003 PROMINA Gwinnett Hospital System (Privileges beginning April 1991, Part time Employment May 1994, Full time from Oct. 2002 until Feb 2003)**

*Lawrenceville, Georgia*

- **MEDICAL DIRECTOR for PROMINA SummitRidge Hospital**, freestanding 76 bed psychiatric hospital for **PROMINA Gwinnett Hospital System**, in Lawrenceville, Georgia. Oversight of Adult, Geriatric, Child, and Adolescent Psychiatric and addictive inpatient programs, partial hospitalization programs (PHP), and intensive outpatient programs (IOP), Consultations Liaison Services for PROMINA Gwinnett Hospital System. Development and oversight of specialty outpatient programming for Women, families, couples and individuals as well as integration of behavioral health services with primary care providers and facilities. Development and oversight of Ambulatory Detox Program. Program development and clinical supervision of all clinical staff including four physician program directors. Provide frequent CME (continuing Medical Education) lectures for general medical and nursing staff at Gwinnett Hospital System.
- **1994-1998, 2000-2002 Chief of the Department of Psychiatry** at PROMINA Gwinnett Health System. Member of the Gwinnett Health System Medical Executive Committee, Credentialing Committee, Medical Records Committee, Physician's Advisory Committee on Information Systems.
- **1998-2003 Post Acute Service line Physician Coordinator** at Gwinnett Hospital System.
- **1998-2000: Vice Chairman of Dept. of Psychiatry, Chairman of Psychiatry Performance Improvement, Committee**, and Member of Medical Staff Performance Improvement Committee
- **1999-2003-Chairman of the Gwinnett Health System Physician Quality Council**. Member of the Gwinnett Managed Care, Inc. Clinical Effectiveness Committee
- **1999-2003-Member of the Medication Errors Reduction Team**, and the Patient Safety Committee for Gwinnett Hospital System
- **1998-present-Trained Facilitator for PHIP (Personal Health Improvement Program)** created in 1985 by Harvard Pilgrim Health Plan to identify and treat high utilizers of primary care who have diagnosis that have a strong psychological overlay. Program designed to increase patient's coping skills and decrease utilization, improve patient and provider satisfaction and reduce over all cost to both health plans and patients. Teaching courses to patients; providing training to primary care and specialty physicians, nurses, and administrative personnel.

**June 1998-Sept. 2002 Augusta Region 12 Crisis Access Center,**

*Augusta Georgia; (Part time)*

**MEDICAL DIRECTOR and Chair of the Quality Improvement Committee.** This project is a joint venture in managed behavioral health care for the indigent patients in the 13 county region, between the **Region 12 Mental Health, Mental Retardation, Substance Abuse Regional Board; East Central Georgia Community Mental Health Services Board; Ogeechee Community Mental Health Services Board, Medical College of Georgia, and University Hospital Systems.**

Development of a single point of entry for crisis patients thereby increasing overall access to care, generating a reduction in the use of the Georgia Regional Hospital with an increase in the utilization of community based treatment options for the indigent patient. Developed and providing Medical

Management following a traditional managed care model. Training for professionals, community leaders, and patients.

**Jan 1991- Sept 1997 Susan Kaye Pearson, MD, PC, (Full time from Jan 1991 until April 1993, then part time until Sept 1997)**

*Snellville, Georgia*

- **Private practice of psychiatry**, adult and adolescent with emphasis on women's issues, anxiety disorders, mood disorders, and eating disorders
- **Private consulting** to 3<sup>rd</sup> and 4<sup>th</sup> generation family owned businesses and large multi-national companies
- **Personal coaching** to executives, strategic planning, assessment of potential hires in key executive positions, along with preparation of the candidate to assume the position and preparation of the team to accept new leadership

**June 1994-October 2000 PROMINA Health Systems/Health Care, Inc. (Part time)**

*Atlanta, Georgia*

- Medical Director of Behavioral Health for **PROMINA Health Systems, Health Care, Inc., and HUMANA** 95 providers in 58 locations through out Metropolitan Atlanta, with 28,000 risk lives. Network development, Medical Management, Clinical Standardization for a Provider sponsored vertically integrated health care delivery system.

Member of:

Medical Management Committee, Physician Sub-Specialty Committee, Credentialing Committee, Pharmacy and Therapeutics Committee, Quality Committee, and High Risk OB subcommittee.

Developed guidelines for the treatment of depression and anxiety in primary care. Also development of stop smoking programs for pregnant women and new parents with American Cancer Society.

**June 1997-May 2000 Behavioral Health Partners, Inc. (part-time)**

*Atlanta, Georgia*

**Chief Medical Officer**

- Consultant for Public and Private Integrated Managed Behavioral Health Consulting options for managed care organizations and behavioral health delivery systems.
- Consultative Contracts 1997 through 1999:

**Evergreen Health Plan,**

*Columbus, Georgia;*

Behavioral Health Medical Management for a provider sponsored vertically integrated health care delivery system. Provider relations, credentialing and protocol development

**Novant Health System**

*Greensboro North Carolina*

Strategic Planning for integrated health care delivery system. Also, medical consultation for eating disordered patients in their health plan.

**Moore Regional Health System**

*Pinehurst, North Carolina*

Strategic Planning for expansion of behavioral health product line. Input into program development, physician relations, credentialing, public/private joint venture opportunities, and facility design.

**Dalton Health System**

*Dalton, Georgia*

Strategic Planning for redesign of behavioral health product line in preparation for influx of managed care in to their region. Public/private joint venture opportunities and physician hospital relations.

**June 1994- April 1996 MedStrategies (Part Time)**

*Atlanta, Georgia*

- **Medical Consultant** for Credentialing, Medical Management, program Development, Delegation of Credentialing, Peer Review for MCO's, hospitals and insurance companies (primarily in Med/Surg)
- **Site Reviewer** for URAC (Utilization Review Accreditation Commission)  
National Accreditation body for managed care organizations, certification required for licensing in 16 states.

**April 1993-April 1994 Charter Peachford Hospital (Privileges starting Jan 1991, part time employment April 1993-April 1994)**

*Atlanta, Georgia*

- **Medical Director of Women's Services** for a 14-bed inpatient unit in a freestanding psychiatric hospital. Program development and clinical supervision of staff addressing women's mental health issues, including eating disorders affective disorders, and substance abuse.
- **President Elect of the Medical Staff**, Member of the Medical Executive Committee, Credentialing Committee, Peer Review Committee, Chair Infection Control Committee 1991-1994

**Jan 1990- Sept. 1991 Martinsville Community Hospital**

*Martinsville, Virginia*

- **Medical Director of the inpatient Psychiatric Unit.** Program development and staff supervision. 18 bed unit in a Med/Surg. Hospital
- Member of the Peer Review Committee, Credentials Committee
- Private practice of general psychiatry, adult and adolescent

**Professional Memberships**

Founding Member of the Honorary Board of Regents of the National Physician Ambassadors Program

American Academy of Anti-Aging Medicine

Atlanta Medical Women's Alliance

American Psychiatric Association

American Society of Addiction Medicine

Georgia Society of Addiction Medicine

Secretary of GASAM April 2010-August 2010



President Elect of GASAM August 2010-Present

National College of Forensic Examiners

Previously active in:

American Society for Pain Practice Management

American Society of Interventional Pain Physicians

Association of Occupational and Organizational Psychiatrist

American College of Physician Executives

Georgia Society for Interventional Pain Physicians

Medical Association of Georgia

Mental Health Association of Georgia

Physician Executives of Georgia

Society for Pain Practice Management

## **Publications**

Blank S, Karan, LD. (2013) "Tobacco Use Disorders." The ASAM Criteria (eds, David Mee-Lee, etc) The Change Company, Carson City, Nevada.

"Are we really the Post-Prozac Nation?" with Tara Weng  
Galtme Healthy Living and Shine onYahoo (picked up article). April 2012

Foreward for the book "Finding a Purpose in the Pain"  
by James Fenley, MD, releaed January 2012

"Memoir of an Alcoholic Parent"with Stefanie Wilder-Taylor  
Parenting Magazine. April 2011

"Impaired Professionals"  
Atlanta Hospital News. January 2009

"Mirror, Mirror; Vanity and Insecurity"  
The New You Magazine. Fall 2004

"Confidence; the Key to a Healthy Self Esteem"  
The New You Magazine. Summer, 2004.

"Ready for a Change?"  
The New You Magazine. Inaugural Issue, Spring, 2004.

"Detection of Drug Abuse in the Work Place"  
Family Business Journal. Winter 1996

"More than just a Bad Hair Day"  
Family Business Journal. Summer 1996.

**"The Immortal CEO"**

*Family Business Journal*. Spring 1996.

**"Eating Disorders in Males"**

*Kid Stuff*. Fall 1992.

**"Velvet Bricks, the Long Term Hospital Treatment of the Borderline Patient"**

*Psychoanalytic Inquirer*. Winter 1989.

**Volunteer Experience**

**Dec. 2011- Present** Advisory Board for the Ministry of Health, Ankara, Turkey, regarding Credentialing of Non-physicians and Licenselng and Credentialing of Addiction Treatment at all levels of care.

**June 2010- Present** Advisory Board Member Georgia Physician Health Program, Member of the Compliance Committee

**May 2009-Present:** Volunteer faculty at Treatment Center in Gaziantep, Turkey. Center for treatment of adolescent boys with addiction.

**2002-2007:** Medical Explorer's Program, Gwinnett School System

**1999-2001:** Board of Directors-National Mental Health Association of Georgia

**1997-2007:** Peer Review -Composite Board of Medical Examiners for State of Georgia

**1996-1999:** Board of Directors-Mental Health Association of Metro Atlanta.  
Chairman of the Professional Education Committee

**1990-1991:** Board of Directors-Martinsville, Virginia Chapter of the Alliance for the Mentally Ill.  
Secretary 1998-1999

**1976-1981:** Founding Member- MADD (Mothers against Drunk Drivers) Columbia County Chapter, Martinez, Georgia

**Media Work (partial list):**

**"Detailing Addiction with Dr. Susan Blank"** America's web radio AM 1640. Sandy Springs, Georgia. Weekly one hour show dedicated to educating the public on issues related to the disease of addiction. Started April 6, 2010 through present.

**Dr. Oz television show:** "Five signs you may have a problem with alcohol." Nov. 22, 2009. NBC Studios, New York City.

**"Keys to Dealing with Alcohol Abuse in the Workplace"** National Constitution Center, Live Webcast. April 22, 2008

**"Recognizing Addition in the Workplace"** Industrial Accident Prevention Association (IAPA) Health and Safety Canada 2008 Conference, Toronto, Canada. April 21, 2008

**"Creating the Multidisciplinary Integrated Treatment Team: A CEO's Perspective"** CME OutFitters, Live Webcast, April 17, 2008

**"Alcoholism in the Law Firm"** National Constitution Center, Webcast, April 3, 2008.

**"Warning: Side Effects May Include Recovery: An Update on Medication Assisted Recovery"**  
Live Webcast. Feb 24, 2011 Vendome Webinars.

**"Problems with prescription drug addiction"** Pharmacy Radio at the University of Georgia PBS station"  
Aired 10-20-10.

### **Recent Presentations (partial list):**

**"Critical Review of the Effectiveness of Opioids in Chronic Pain"** CME Reivew Course for the American Society of Interventional Pain Physicians. Denver, Colorado. October 5, 2013.

**"Current Drug therapy Non-Opioids Drug Therapy and Other Interventions"** CME Reivew Course for the American Society of Interventional Pain Physicians. Denver, Colorado. October 4, 2013

**"Comprehensive Assessment and Documentation of a Chronic Pain Patient"** CME Reivew Course for the American Society of Interventional Pain Physicians. Denver, Colorado. October 4, 2013

**"Cognitive Impairment: A Seldom Discussed Complication of Substance Use Disorders"** CME workshop for US Journal Training. Las Vegas, Nevada. September 27, 2013

**"When Waiting to Hit Bottom is too Late; Tobacco, the BIGGEST Addiction."** CEU Workshop for the National Conference on Addiction Disorders. Anaheim California, September 25, 2013

**"Hormonal Abnormalities in Patients with Addiction"** CME workshop or US Journal Training. Las Vegas, Nevada. September 27, 2013

**"Psychiatric Cormordiaties in Pain & Addiction"** CME Presentation for the American Society of Interventional Pain Physicians. St Louis, MO July 30, 2013.

**"Psychopharmacology of Pain and Addiction"** CME Presentation for the American Society of Interventional Pain Physicians. St Louis, MO July 30, 2013.

**"Behavioral Addiction & Treatment"** CME Presentation for the American Society of Interventional Pain Physicians. St Louis, MO July 30, 2013.

**"Addiction and the Chronic Pain Patient-when have They Crossed that Line in the Sand?"** CME Presentation for Georgia Society of Interventional Pain Physicians annual conference. Lake Oconee, Georgia. April 19, 2013

**"Pain and Addiction: Addicts Hurt, Too"** CME Presentation for GSAM-SCSAM Annual Conference. Charleston, SC June 29-30, 2012

**"How 12 Step Recovery Changes Your Brain."** Full Day Workshop for entire staff, The NeuroPsychiatric Institute (NPI), Istanbul, Turkey. Dec. 12, 2011.

**"Team Work in Addiction Treatment: The Development of a Multidisciplinary Treatment Team"** National Alcohol and Drug Addiction Congress. Antalya, Turkey. Dec. 10, 2011

**"Evidenced Based Practices that have demonstrated effectiveness in Addiction Treatment "** National Alcohol and Drug Addiction Congress. Antalya, Turkey. Dec. 9, 2011

"12 Step Recovery" CME Workshop for the 7<sup>th</sup> National Alcohol and Drug Addiction Congress. Antalya, Turkey. Dec. 9, 2011

"How Recovery Changes the Brain; A Neurobiological Review." Full Day Workshop for the Turkish Psychiatric Association. Ankara, Turkey. Dec. 7, 2011.

"Cognitive Impairment in Addicted Professionals", Canadian Center on Substance Abuse Annual Conference, Vancouver, B.C., CA. Nov. 8, 2011.

"Where is the VIP in UDS: Accountability for the privileged: How Toxicology Saves Lives." Moment of Change Conference: Power, Wealth and Recovery, The Breakers, West Palm Beach, FL. Sept 27, 2011.

"Treatment of Pain in the Addicted Professional" American Flight Attendants Association Annual Conference on Addiction. Baltimore, MD. August 16, 2011.

"Addicts Hurt Too, the Interface of Pain and Addiction", National Rural Institute on Alcohol and Drug Abuse, University of Wisconsin-Stout Menomonie, WI. June 15, 2011.

"Integrated Addiction Treatment Model, the Role of Drug Testing", presentation for Medical Staff at Hazelden, Center City, MN. May 25, 2011.

"Cognitive Impairment in Professionals" CEU workshop at Interventionist Conference, Atlanta, Georgia. October 23, 2010.

"Medicine Cabinet Casualties: Addiction issues in pain management" DEA Conference at University of Georgia, Athens, Georgia. October 19, 2010.

"Getting an A Performance: Risks of Performance enhancing drugs for student athletes" Oglethorpe University, Atlanta, Georgia April 20, 2010.

"Integration of Addiction Treatment: Mercer University. Atlanta, Georgia, March 12, 2010.

"Neurobiology of Addiction" CEU Event St Judes Treatment Center, Atlanta, Georgia Jan 29, 2010

"How Alcohol and Drug Treatment Can Help. Pre-trial Intervention" CLE Event sponsored by Institute of Continuing Legal Education. (ICLE) Atlanta, Georgia. Dec. 11, 2009.

"Addicts Hurt Too. Ethical dilemmas in treatment co-occurring pain and addiction. CEU event. Foundations Recovery Network, Atlanta. Georgia. Nov. 29, 2009

Dr. Oz television show: "Five signs you may have a problem with alcohol." Nov. 22, 2009. NBC Studios, New York City.

"Ethics of treating patients with chronic pain and addiction" Annual meeting of Southeastern Pharmacy Association. Atlanta, Georgia. Nov. 14. 2009.

"The Neurobiology of Process Addictions." Foundations Conference, Las Vegas, Nevada. April 24, 2009

"Professional Women and Addiction: a review of Caron Treatment Center Data." Spring meeting of the Maine Women's Law Section and Maine Medical Association. Portland, ME. Feb. 27, 2009.

"Professional Women and Addiction, a review of Caron Treatment Center Data." Atlanta Women's Medical Alliance. Atlanta, Georgia Jan. 10, 2009.

"How Mental Health & Addiction Among Working Parents & Children Affects the Bottom Line". 3<sup>rd</sup> US/Canada Global Roundtable on Mental Health and Productivity. Harvard Medical School, Boston MA. May 29, 2008.

"Ethics of Treatment of Alcoholism: Case Presentation". Scattergood Ethics Conference. UPENN, The Wharton School of Business. Philadelphia, PA. May 21, 2008

"How Depression and Addiction Effect Professional Women" Workshop presented along with Louise Thomas, Esq., at Combined Fall Meeting of the Women's Law Section of the Maine Bar Association and the Women's Medical Society of Maine. Portland, Maine. Nov 1, 2007

"Painful Treatment: When Pain and Addiction Collide" Workshop presented at Canadian Society of Addiction Medicine Annual Meeting. Ottawa, Ontario, Canada. Oct 12, 2007

"Ethics in the Treatment of Patients with Chronic Pain and Addiction" CME Workshop for University of Georgia Co-Occurring Disorders conference. Athens, Georgia. Feb 8, 2007.

"New Treatments for the Disease of Addiction and Pain Management in the Addicted Patient" CEU Workshop for the Georgia Licensed Professional Councilors, Atlanta, Georgia, January 27, 2007.

"New Treatments for the Disease of Addiction" CEU Presentation for Georgia Psychological Association Annual Meeting. Atlanta Georgia, December 8, 2007.

"The Role of the Addictionologist in a Pain Management Practice" CME Presentation, Annual Meeting of Georgia Society of Interventional Pain Physicians, Lake Oconee, Georgia, July 22, 2006

"New Developments in the Treatment of Stimulant and Alcohol Dependence" CME Presentation, Atlanta Women's Medical Alliance Atlanta, Georgia July 13, 2006

"Women, Spirituality and Recovery: Talbott Recovery Campus Data" CME Presentation, Annual Neuroscience Meets Recovery Conference, Las Vegas, Nevada March 11, 2006

"Women and the Challenges of Continuing Care: Talbott Recovery Campus Data" CME Presentation, Annual Neuroscience Meets Recovery Conference, Las Vegas, Nevada March 10, 2006

"Women with Co-Occurring Disorders: Talbott Recovery Campus Data" CME Presentation, Annual Neuroscience Meets Recovery Conference, Las Vegas, Nevada, March 9, 2006

"The Disease of Addiction" Presentation to Masters Degree Candidates, Georgia State University, Atlanta, Georgia February 2006

"The Treatment and Recovery of Health Care Professionals, Physicians, Dentists, Nurses and Pharmacists: Talbott Recovery Campus Data" CME Presentation at Annual New England Professionals Group Meeting, Portland, Maine. November 5, 2005.

"The Impaired Attorney; Assessment and Treatment Comparisons: Talbott Recovery Campus Data" CME Presentation at Annual New England Professionals Group Meeting, Portland, Maine. November 4, 2005.

"Recognizing Addiction in Medically Ill Patients" and "Grief Counseling". Three day seminar for Pinnacle Care International, Baltimore Maryland. October 18-20, 2005

"Assessment and Treatment Planning for Impaired and Disruptive Dentists: Talbott Recovery Campus Data" Dental Board Administrators at the ADA Annual meeting, Philadelphia, Pennsylvania. October 8, 2005.

"Stress Reduction and Management" Three day seminar for Pinnacle Care International, Baltimore Maryland. August 16-18, 2005.

"Double Trouble: Dual Diagnosis in Dentist and Pharmacists: Talbott Recovery Campus Data" CME Presentation for Texas Pharmacy Association, Austin, Texas. April 3, 2005.

"Dual Diagnosis-Double Trouble: Talbott Recovery Campus" Southeastern Pharmacy Recovery Network Annual Meeting, Simpsonwood Conference Center, Atlanta, Georgia. November 13, 2004

"Defensive Documentation" Grand Rounds, Talbot Recovery Campus. Atlanta, Georgia. July 8, 2004.

"The Disease of Addiction" Presentation for Family Week at Talbott Recovery Campus, Atlanta, Georgia, March 16, 2004.

"Addiction Treatment for the Impaired Professional" Presentation for the Physicians and Staff of the Virginia Health Program for Impaired Professionals. Richmond, Virginia, February 17, 2004.

"Women and Addiction: 3 Year Research Study at Talbott Recovery Campus" CME Presentation at SECAD 2003, Atlanta, Georgia, December 4, 2003.

"The Impaired and Disruptive Physician" CME Presentation to the San Juan Hospital System, Annual Medical Staff Meeting. Farmington, New Mexico, November 19, 2003.

"Substance Abuse, Diagnosis and Treatment: What Health Care Professionals Need to Know" CME Presentation, Grand Rounds, Gwinnett Hospital System, Lawrenceville, Georgia, October 23, 2003.

"So, you might want to be a Psychiatrist, The Study of the Brain" Presentation to The Gwinnett County High Schools Medical Explorers Program, Gwinnett Hospital System, Lawrenceville, Georgia, April 24, 2002.

"Informed Consent and the Psychiatric Patient." Grand Rounds, Gwinnett Hospital System. Lawrenceville, Georgia, May 31, 2001

"Mind Body Medicine: Understanding the Personal Health Improvement Program." CME Presentation, SummitRidge Hospital. Lawrenceville, Georgia Sept. 19, 2000.